

**TRUJILLO RODRIGUEZ & RICHARDS, LLC**

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Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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PATRICK BRADY, et al.	:	Civil Action No. 02-2917 (JEI)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
AIR LINE PILOTS ASSOCIATION, INTERNATIONAL,	:	
	:	
Defendant.	:	
	:	

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**PLAINTIFFS' NOTICE OF MOTION FOR PROTECTIVE ORDER PRECLUDING  
DEPOSITIONS OF SCOTT SCHWARTZ AND JOHN HEFLEY**

TO: Daniel M. Katz, Esq.  
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PLEASE TAKE NOTICE that on February 4, 2013, Plaintiffs shall move before the  
United States District Court, District of New Jersey, Mitchell H. Cohen U.S. Courthouse, One  
John F. Gerry Plaza, Fourth and Cooper Streets, Camden, New Jersey, for a Protective Order  
Precluding the Depositions of Scott Schwartz and John Hefley.

In support of this motion, Plaintiffs will rely upon the accompanying Memorandum of Law and Certification of Allen P. Press. A proposed Form of Order is enclosed.

Oral Argument is requested if opposed.

Dated: January 10, 2013

Respectfully submitted,

**TRUJILLO RODRIGUEZ & RICHARDS, LLC**

By: s/ Lisa J. Rodriguez

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**GREEN JACOBSON, P.C.**

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